

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

OCT 16 2019

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY ae, DEPUTY

UNITED STATES OF AMERICA,)

Plaintiff,)

-vs-)

KEEGAN KELLEY HARROZ and)

BARRY ROWLAND TITUS, II,)

Defendants.)

No.

CR-19-325SLP

Violations: 18 U.S.C. § 922(g)(8)
18 U.S.C. § 922(n)
18 U.S.C. § 922(d)(1)
18 U.S.C. § 922(d)(8)
18 U.S.C. § 924(d)
28 U.S.C. § 2461(c)

INDICTMENT

The Federal Grand Jury charges:

COUNT 1

(Prohibited Person in Possession of Ammunition)

On or about February 6, 2019, in Oklahoma County, Oklahoma, in the Western District of Oklahoma,

----- **KEEGAN KELLEY HARROZ** -----

knowingly possessed ammunition, to wit: 20 rounds of .40 S&W Hornady-branded caliber ammunition; 25 rounds of 9mm Luger Hornady-branded caliber ammunition; and 50 rounds of .22 Magnum-caliber Cascade Cartridges Inc. (CCI) branded ammunition, that had been previously shipped and transported in, and affected, interstate and foreign commerce. At the time she possessed the ammunition, **KEEGAN KELLEY HARROZ** was subject to a court order issued after a hearing of which she had received actual notice, and at which she had an opportunity to participate. That court order, to wit: PO-19-98,

issued January 24, 2019, by the District Court of Oklahoma County, restrained **KEEGAN KELLEY HARROZ** from harassing, stalking, or threatening her intimate partner, and included a finding that **KEEGAN KELLEY HARROZ** represented a credible threat to the physical safety of her intimate partner, and, by its terms, explicitly prohibited the use, attempted use, or threatened use of physical force against her intimate partner. **KEEGAN KELLEY HARROZ** knew she was subject to this order when she possessed the ammunition.

All in violation of Title 18, United States Code, Section 922(g)(8), the penalty for which is found at Title 18, United States Code, Section 924(a)(2).

COUNT 2
(Prohibited Person in Possession of a Firearm)

On or about August 4, 2019, in Cleveland County, Oklahoma, in the Western District of Oklahoma,

----- **BARRY ROWLAND TITUS, II**, -----
knowingly possessed a firearm, to wit: a Spike's Tactical, Model ST 15, multi-caliber, semi-automatic rifle, serial number NSL159529, that had been previously shipped and transported in, and affected, interstate and foreign commerce. At the time he possessed the firearm, **BARRY ROWLAND TITUS, II**, was subject to a court order issued after a hearing of which he had received actual notice, and at which he had an opportunity to participate. That court order, to wit: PO-19-1400, issued June 12, 2019, by the District Court of Oklahoma County, restrained **BARRY ROWLAND TITUS, II**, from harassing, stalking, or threatening his intimate partner, and included a finding that **BARRY**

ROWLAND TITUS, II, represented a credible threat to the physical safety of his intimate partner, and, by its terms, explicitly prohibited the use, attempted use, or threatened use of physical force against his intimate partner. **BARRY ROWLAND TITUS, II**, knew he was subject to this order when he possessed the firearm.

All in violation of Title 18, United States Code, Section 922(g)(8), the penalty for which is found at Title 18, United States Code, Section 924(a)(2).

COUNT 3
(Illegal Receipt of a Firearm by a Person under Indictment)

On or about August 4, 2019, in Cleveland County, Oklahoma, in the Western District of Oklahoma,

----- **BARRY ROWLAND TITUS, II**, -----
who was then under Indictment in Oklahoma County District Court Case No. CF-18-4664, for crimes punishable by imprisonment for a term exceeding one year, alleging three counts to wit:

Count 1 - Domestic Abuse Assault and Battery Resulting in Great Bodily Injury;

Count 2 - Domestic Abuse by Strangulation; and

Count 3 - Kidnapping,

did willfully receive a firearm, that is a Spike's Tactical, Model ST 15, multi-caliber, semi-automatic rifle, serial number NSL159529, which was shipped or transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(n), the penalty for which is found at Title 18, United States Code, Section 924(a)(1)(D).

COUNT 4
(Unlawful Disposal of a Firearm)

On or about August 4, 2019, in Cleveland County, Oklahoma, in the Western District of Oklahoma,

----- **KEEGAN KELLEY HARROZ** -----

sold or otherwise disposed of a firearm, to wit: a Spike's Tactical, Model ST 15, multi-caliber, semi-automatic rifle, serial number NSL159529, to a prohibited person, **BARRY ROWLAND TITUS, II**, at a time when such prohibited person was under Indictment in Oklahoma County District Court Case No. CF-18-4664, for crimes punishable by imprisonment for a term exceeding one year, alleging three counts to wit:

Count 1 - Domestic Abuse Assault and Battery Resulting in Great Bodily Injury;

Count 2 - Domestic Abuse by Strangulation; and

Count 3 - Kidnapping,

and while knowing or having reasonable cause to believe that **BARRY ROWLAND TITUS, II**, was under such indictment.

All in violation of Title 18, United States Code, Section 922(d)(1), the penalty for which is found at Title 18, United States Code, Section 924(a)(2).

COUNT 5
(Unlawful Disposal of a Firearm)

On or about August 4, 2019, in Cleveland County, Oklahoma, in the Western District of Oklahoma,

----- **KEEGAN KELLEY HARROZ** -----

sold or otherwise disposed of a firearm to wit: a Spike's Tactical, Model ST 15, multi-

caliber, semi-automatic rifle, serial number NSL159529, to a prohibited person, **BARRY ROWLAND TITUS, II**, at a time when such prohibited person was subject to a court order issued by the District Court of Oklahoma County, Oklahoma, after a hearing of which he had received actual notice, and at which he had an opportunity to participate, restraining him from harassing, stalking, and threatening his intimate partner, and from engaging in other conduct that would place such intimate partner in reasonable fear of bodily injury. Such order, by its terms, explicitly prohibited the use, attempted use, and threatened use of physical force against his intimate partner that would reasonably be expected to cause bodily injury. At the time of said disposal, **KEEGAN KELLEY HARROZ** knew or had reasonable cause to believe that **BARRY ROWLAND TITUS, II**, was subject to such a court order.

All in violation of Title 18, United States Code, Section 922(d)(8), the penalty for which is found at Title 18, United States Code, Section 924(a)(2).

COUNT 6
(Prohibited Person in Possession of Firearms and Ammunition)

On or about September 13, 2019, in Oklahoma County, Oklahoma, in the Western District of Oklahoma,

----- **KEEGAN KELLEY HARROZ** -----

knowingly possessed firearms and ammunition, to wit: a Ruger, Model EC9s, 9mm Luger caliber semi-automatic pistol, serial number 453-86112; Glock GMBH, Model 27Gen4, .40 S&W caliber semi-automatic pistol, bearing serial number RLH325; North American Arms, Model NAA22, .22 Magnum caliber revolver, bearing serial number VT10643; 10

rounds of .40 S&W Hornady brand caliber ammunition; 57 rounds of .40 S&W Winchester brand ammunition; 42 rounds of 9mm Luger caliber Winchester brand ammunition; 100 rounds of 9mm Luger caliber Blazer brand ammunition; and 45 rounds of Cascade Cartridges Inc. (CCI) brand .22 Magnum caliber ammunition, that had been previously shipped and transported in, and affected, interstate and foreign commerce. At the time she possessed the firearms and ammunition, **KEEGAN KELLEY HARROZ** was subject to a court order issued after a hearing of which she had received actual notice, and at which she had an opportunity to participate. That court order, to wit: PO-19-98, issued April 3, 2019, by the District Court of Oklahoma County, restrained **KEEGAN KELLEY HARROZ** from harassing, stalking, or threatening her intimate partner, and included a finding that **KEEGAN KELLEY HARROZ** represented a credible threat to the physical safety of her intimate partner, and, by its terms, explicitly prohibited the use, attempted use, or threatened use of physical force against her intimate partner, **KEEGAN KELLY HARROZ** knew she was subject to this order when she possessed the firearms and ammunition.

All in violation of Title 18, United States Code, Section 922(g)(8), the penalty for which is found at Title 18, United States Code, Section 924(a)(2).

FORFEITURE

A. The allegations contained in this Indictment are hereby re-alleged and incorporated for the purpose of alleging forfeiture.

B. Upon conviction of the offense alleged in Counts 1 through 6 of this Indictment, defendants **KEEGAN KELLEY HARROZ** and **BARRY ROWLAND**

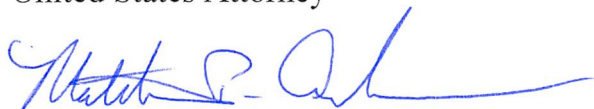
TITUS, II, shall forfeit to the United States any and all firearms and ammunition involved in the commission of the offenses.

All pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:


FOREPERSON OF THE GRAND JURY

TIMOTHY J. DOWNING
United States Attorney



MATTHEW P. ANDERSON
JACQUELYN M. HUTZELL
Assistant United States Attorneys